

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Docket No. 4055

**CERTIFICATION OF COUNSEL REGARDING MOTION BY
PATRICK GRUHN, ROBIN MATZKE, AND LOREM IPSUM UG
TO LIMIT SERVICE OF MOTIONS TO DISMISS BANKRUPTCY CASES
OF (A) FTX TRADING LTD. AND (B) MACLAURIN INVESTMENTS LTD.**

The undersigned counsel hereby certifies that:

1. On November 20, 2023, Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG (collectively, “**LI Parties**”), filed the *Motion by Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Limit Service of Motions to Dismiss Bankruptcy Cases of (A) FTX Trading Ltd. and (B) Maclaurin Investments, Ltd. (“**Motion**”)* [Docket No. 4055].

2. Pursuant to the notice of hearing on the Motion, objections to the relief sought in the Motion were due on or before December 6, 2023, at 4:00 p.m. (ET).

3. On December 6, 2023, the Debtors filed *Debtors’ Limited Objection to the Motion by Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Limit Service of Motions to Dismiss Bankruptcy Cases of (A) FTX Trading Ltd. and (B) Maclaurin Investments Ltd. (“**Limited Objection**”)* [Docket No. 4512].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in the above-captioned jointly-administered chapter 11 cases, a complete list of the debtors (collectively, “**Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. Attached hereto as **Exhibit A** is a revised proposed order (“**Revised Order**”) that resolves the Limited Objection. The Debtors have no objection to entry of the Revised Order.

5. A redlined copy of the Revised Order is attached hereto as **Exhibit B**, showing changes made from the version of the order filed with the Motion.

6. The Debtors do not object to the entry of the Revised Order.

7. Accordingly, the LI Parties respectfully request entry of the Revised Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

[Signature Page Follows]

Dated: December 11, 2023
Wilmington, Delaware

/s/ Laura Davis Jones

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